

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-12480 (LSS)

(Jointly Administered)

**NOTICE OF AGENDA FOR HEARING OF MATTERS SCHEDULED FOR
MAY 20, 2025 AT 10:00 A.M. (PREVAILING EASTERN TIME)**

[Continued on Next Page]

The Debtors in these chapter 11 cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy's Newco, LLC (5404), Buddy's Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260), Franchise Group Newco BHF, LLC (4123), Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies "Plus", LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors' headquarters is located at 2371 Liberty Way, Virginia Beach, Virginia 23456.

All hearings before Judge Silverstein are in person.

Permission to appear remotely at any hearing must be approved by chambers. Case participants who are permitted to attend remotely must register using the <http://www.deb.uscourts.gov/ecourt-appearances> tool described below.

The deadline to register for remote attendance is 4:00 P.M. (prevailing Eastern Time) the business day before the hearing unless otherwise noticed. When registering, case participants may choose to attend remotely through video or audio access. Please be aware that if you choose audio access and the proceedings involve witness testimony, you may be disconnected entirely from the hearing or moved to a waiting room and unable to hear that portion of the proceedings. Once you register your appearance, a screen will appear that states “Thank you for registering your appearance in (Case number) (Case name).” An electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.

**Please do not contact the United States Bankruptcy Court
for the District of Delaware to confirm registration.**

ADJOURNED/RESOLVED MATTERS

1. Motion of OpCo 2L Agent and Ad Hoc Group of Second Lien Lenders for Allowance of a Superpriority Administrative Expense Claim [[D.I. 978](#), 2/13/25]

Objection Deadline: March 11, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Certification of Counsel Regarding Order Approving Stipulation Staying Motion of OpCo 2L Agent and Ad Hoc Group of Second Lien Lenders for Allowance of a Superpriority Administrative Expense Claim [[D.I. 1407](#), 5/5/25]
- B. Order Approving Stipulation Staying Motion of OpCo 2L Agent and Ad Hoc Group of Second Lien Lenders for Allowance of a Superpriority Administrative Expense Claim [[D.I. 1445](#), 5/12/25]

Responses Received: None to date.

Status: This matter has been indefinitely stayed by stipulation of the parties, as approved by the Court. *See* Docket No. 1445. A hearing is not required.

2. First Omnibus (Non-Substantive) Objection of the Ad Hoc Group of Freedom Lenders to Certain Claims Filed Against the Holdco Debtors [[D.I. 1059](#), 3/6/25]

Objection Deadline: March 27, 2025, at 4:00 p.m. (ET); extended for the Debtors to May 5, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Notice of Submission of Claims Relating to the First Omnibus (Non-Substantive) Objection of the Ad Hoc Group of Freedom Lenders to Certain Claims Filed Against the HoldCo Debtors [[D.I. 1324](#), 4/28/25]
- B. Certification of Counsel Regarding Order Sustaining First Omnibus (Non-Substantive) Objection of the Ad Hoc Group of Freedom Lenders to Certain Claims Filed Against the HoldCo Debtors [[D.I. 1339](#), 4/29/25]
- C. Renotice of First Omnibus (Non-Substantive) Objection of the Ad Hoc Group of Freedom Lenders to Certain Claims Filed Against the HoldCo Debtors [[D.I. 1486](#), 5/15/25]

Responses Received: None to date.

Status: By agreement of the parties this matter has been adjourned to a date and time to be determined.

3. Motion of the Official Committee of Unsecured Creditors for Entry of an Order Granting the Committee, Leave, Standing and Authority to Commence, Prosecute and Settle Certain Claims on Behalf of the OpCo Debtors' Estates [[D.I. 1200](#), 3/28/25]

Objection Deadline: April 11, 2025, at 4:00 p.m. (prevailing Eastern Time)

Related Documents: None to date.

Responses Received: None to date.

Status: This matter has been adjourned indefinitely under the terms of the global settlement agreement.

4. Motion of Granite Telecommunications, LLC for Allowance and Payment of Administrative Expense Claim [[D.I. 1222](#), 4/1/25]

Objection Deadline: April 15, 2025, at 4:00 p.m. (prevailing Eastern Time); extended to May 7, 2025, at 4:00 p.m. (prevailing Eastern Time) for the Debtors

Related Documents: None to date.

Responses Received: None to date.

Status: This matter has been adjourned as a cure dispute pursuant to the Order (I) Authorizing Franchise Group Intermediate V, LLC to Enter into and Perform Its Obligations Under the Asset Purchase Agreement, (II) Approving the Sale of Certain Assets Free and Clear of all Claims, Liens, Rights, Interests, and Encumbrances, (III) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief [[D.I. 1429](#), 5/7/2025]

5. Motion of MEL Indiana, LLC for Allowance and Payment of Administrative Expense Claim [[D.I. 1305](#), 4/23/25]

Objection Deadline: May 5, 2025, at 4:00 p.m. (ET)

Related Documents:

- A. Notice of Withdrawal of Motion of MEL Indiana, LLC for Allowance and Payment of Administrative Expense Claim [[D.I. 1487](#), 5/15/25]

Responses Received: None.

Status: This matter has been withdrawn. A hearing is not required.

MATTERS UNDER CERTIFICATION OF COUNSEL

6. Centerpoint 550, LLC's Motion for Relief from the Automatic Stay to Setoff Security Deposit Against Lease Rejection Damages [[D.I. 1045](#), 2/28/25]

Objection Deadline: March 11, 2025, at 4:00 p.m. (ET)

Related Documents:

- A. Certification of Counsel Regarding Centerpoint 550, LLC Motion for Relief from the Automatic Stay to Setoff Security Deposit Against Lease Rejection Damages [[D.I. 1485](#), 5/15/25]

Responses Received: None.

Status: A certification of counsel resolving this matter has been filed. A hearing is not required unless the Court has questions or concerns.

7. Motion of Jonathan Ortiz Munoz and Hannah Shalom Moody for Retroactive Relief from the Automatic Stay and, to the Extent Applicable, the Plan Injunction to Liquidate Claims in Pending State Court Civil Cases [[D.I. 1273](#), 4/11/25]

Objection Deadline: April 25, 2025, at 4:00 p.m. (ET); extended to March 16, 2025 at noon (prevailing Eastern Time) for the Debtors

Related Documents:

- A. Re-Notice of Motion for Retroactive Relief from the Automatic Stay and to the Extent Applicable, the Plan Injunction to Liquidate Claims [[D.I. 1315](#), 4/25/25]

Responses Received:

- B. Informal Response from the Debtors

Status: The parties will submit under certification of counsel a proposed stipulation and order consensually resolving this matter shortly after filing this Agenda. A hearing is not required unless the Court has questions or concerns.

MATTERS GOING FORWARD

- 8. Debtors' Twelfth Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a), 365(a), and 554 of the Bankruptcy Code Authorizing the Debtors to (I) Reject Certain Unexpired Leases and a Certain Unexpired Sublease, Effective as of the Rejection Date; and (II) Abandon Personal Property [[D.I. 875](#), 1/30/25]

Objection Deadline: March 13, 2025, at 4:00 p.m. (ET)

Related Documents:

- A. Twelfth Omnibus Order, Pursuant to Sections 105(a), 365(a), and 554 of the Bankruptcy Code Authorizing the Debtors to (I) Reject Certain Unexpired Leases, Effective as of the Rejection Date; and (II) Abandon Personal Property [[D.I. 968](#), 2/12/25]

Responses Received:

- B. Limited Objection and Reservation of Rights of the ChildSmiles Group, LLC, a/k/a Abra Health, LLC, to Debtors' Twelfth Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a), 365(a), and 554 of the Bankruptcy Code Authorizing the Debtors to (I) Reject Certain Unexpired Leases and a Certain Unexpired Sublease, Effective as of the Rejection Date; and (II) Abandon Personal Property [[D.I. 933](#), 2/6/25]
- C. Landlord's Response and Reservation of Rights Regarding: Limited Objection and Reservation of Rights of the ChildSmiles Group, LLC, aka Abra Health, LLC, to Debtors' Twelfth Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a), 365(a), and 554 of the Bankruptcy Code Authorizing the Debtors to (I) Reject Certain Unexpired Leases and a Certain Unexpired

Sublease, Effective as of the Rejection Date; and (II) Abandon Personal Property [D.I. 1221, 4/1/25]

Status: The Parties are continuing to negotiate a consensual resolution of this matter. Currently, this matter is going forward.

9. The Settlement-Related Liquidating Trust 2022-23's (I) Motion Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Temporary Allowance of Claims for Purposes of Voting to Accept or Reject Plan; and (II) Response to First Omnibus (Non-Substantive) Objection of the Ad Hoc Group of Freedom Lenders to Certain Claims Filed Against the Holdco Debtors [D.I. 1098, 3/13/25]

Objection Deadline: May 5, 2025, at 4:00 p.m. (ET)

Related Documents: None.

Responses Received:

- A. Debtors' Objection to the Settlement-Related Liquidating Trust 2022-23's Motion Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Temporary Allowance of Claims for Purposes of Voting to Accept or Reject Plan [D.I. 1406, 5/5/25]

Status: This matter is currently going forward.

10. Motion of Granite Telecommunications, LLC for Allowance and Payment of Administrative Expense Claim [D.I. 1269, 4/9/25]

Objection Deadline: April 23, 2025, at 4:00 p.m. (prevailing Eastern Time); extended for the Debtors to 4:00 p.m. (prevailing Eastern Time) on April 29, 2025

Related Documents:

- A. Reply in Support of Motion of Granite Telecommunications, LLC for Allowance and Payment of Administrative Expense Claim [D.I. 1447, 5/12/25]

Responses Received:

- B. Debtors' Objection to Motion of Granite Telecommunications, LLC for Allowance and Payment of Administrative Expense Claim [D.I. 1361, 4/29/25]
- C. Ad Hoc Group of First Lien Lenders' Joinder to Debtors' Objection to Motion of Granite Telecommunications, LLC for Allowance and Payment of Administrative Expense Claim [D.I. 1364, 4/29/25]

Status: The parties are engaged in ongoing discussions to resolve this matter. Currently, this matter is going forward.

11. Debtors' Second Motion for Entry of an Order (I) Enlarging the Period Within Which the Debtors May Remove Actions and (II) Granting Related Relief [[D.I. 1378](#), 5/1/25]

Objection Deadline: May 15, 2025 at 4:00 p.m. (ET)

Related Documents: None to date.

Responses Received: None to date.

Status: The Debtors anticipate filing a certificate of no objection prior to the hearing.

12. Confirmation of the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtors Affiliates [[D.I. 1454](#), 5/14/25]

Objection Deadline: May 7, 2025, at 5:00 p.m. (ET); extended for certain landlords and Tempur Sealy International, Inc. to May 8, 2025 at 4:00 p.m. (ET); extended for certain landlords and current and former directors and officers (Matthew Avril, Cynthia Dubin, and Thomas Herskovitz) to May 9, 2025 at 4:00 p.m. (ET); extended for certain landlords, Oracle America, Inc., Dell Financial Services, L.L.C., KAWIPS Delaware Cuyahoga Falls, LLC, BC Exchange Salt Pond, and BDCFP Radar Distribution Center LLC to May 14, 2025; extended for the Heritage Seymour I, LLC and Heritage Seymour II, LLC, the Chubb Companies, and certain former and current directors and officers to May 16, 2025; at 12:00 p.m. (ET).

Related Documents:

- A. Order (I) Approving the Disclosure Statement, (II) Approving the Solicitation and Voting Procedures, Including (A) Fixing the Voting Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of the Ballots and Solicitation Materials and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation, (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures, and (IV) Granting Related Relief [[D.I. 1019](#), 2/21/25]
- B. Notice of Order (I) Approving the Disclosure Statement, (II) Approving the Solicitation and Voting Procedures, Including (A) Fixing the Voting Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of the Ballots and Solicitation Materials and Establishing Procedures for Voting, and (D) Approving Procedures for Vote

Tabulation, (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures, and (IV) Granting Related Relief [[D.I. 1021](#), 2/21/25]

- C. Affidavit of Publication of the Disclosure Statement Order [[D.I. 1030](#), 2/25/25]
- D. Notice of Filing of Plan Supplement [[D.I. 1182](#), 3/27/25]
- E. Seventh Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1233](#), 4/3/25]
- F. Notice of Filing of Blackline of Seventh Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1234](#), 4/3/25]
- G. Notice of Global Settlement [[D.I. 1290](#), 4/17/25]
- H. Notice of Virtual Status Conference on April 22, 2025 at 1:00 p.m. (ET) Regarding Global Settlement [[D.I. 1291](#), 4/17/25]
- I. Eighth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtors Affiliates [[D.I. 1312](#), 4/25/25]
- J. Notice of Filing of Blackline of Eighth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1313](#), 4/25/25]
- K. Order (I) Approving the Form Content, and Manner of Notice of the Disclosure Statement Supplement, (II) Approving Certain Deadlines and Procedures in Connection with Confirmation, and (III) Granting Related Relief [[D.I. 1322](#), 4/26/25]
- L. Notice of Filing of Amended Plan Supplement [[D.I. 1371](#), 4/30/25]
- M. Notice of Rescheduled Hearing [[D.I. 1380](#), 5/1/25]
- N. Notice of Filing of Blackline of Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1455](#), 5/14/25]
- O. Debtors' Memorandum of Law (I) in Support of an Order (A) Confirming the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates and (B) Approving the Global Settlement and Release of Claims and Causes of Action by and Among the Global Settlement Parties, and (II) Omnibus Reply to Objections Thereto [[D.I. 1457](#), 5/14/25]
- P. Declaration of Craig Johnson of Kroll Restructuring Administration LLC Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the Sixth

Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1458](#), 5/14/25]

- Q. Ad Hoc Group of First Lien Lenders' Joinder to Debtors' Memorandum of Law (I) in Support of an Order (A) Confirming the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates and (B) Approving the Global Settlement and Release of Claims and Causes of Action by and Among the Global Settlement Parties, and (II) Omnibus Reply to Objections Thereto [[D.I. 1460](#), 5/14/25]
- R. Declaration of David Orlofsky in Support of an Order (I) Confirming the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates and (II) Granting Related Relief [[D.I. 1465](#), 5/14/25]
- S. Declaration of Christopher Grubb in Support of an Order (I) Confirming the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates and (II) Granting Related Relief [[D.I. 1466](#), 5/14/25]
- T. Declaration of Christopher P. Meyer in Support of an Order (I) Confirming the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates and (II) Granting Related Relief [[D.I. 1467](#), 5/14/25]
- U. Declaration of Michael J. Wartell in Support of the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1468](#), 5/14/25]
- V. Declaration of Jeffrey W. Kopa in Support of an Order (I) Confirming the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates and (II) Granting Related Relief [[D.I. 1471](#), 5/14/25]
- W. Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order (I) Confirming the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates and (II) Approving the Global Settlement and Release of Claims and Causes of Action by and Among the Global Settlement Parties [[D.I. 1481](#), 5/14/25]

Responses Received:

- X. Informal Responses:
 - i. Office of the United States Trustee for the District of Delaware
 - ii. United States Attorney's Office for the District of Delaware
 - iii. Jeffrey Rhodes at Tayman Lane Chaverri LLP Landlords
 - iv. Temper Sealy International, Inc.
 - v. The Texas Taxing Authorities

- vi. Current and Former Directors and Officers (Matthew Avril, Cynthia Dubin, and Thomas Herskovitz)
 - vii. Certain Landlords Represented by Saul Ewing LLP
 - viii. Texas Comptroller of Public Accounts and the Texas Workforce Commission
 - ix. Omni Hotels Management Corporation (as Agent for Frisco Silver Stay Hotel Company, LLC d/b/a Omni Frisco Hotel at The Star)
 - x. Richard Grisby
 - xi. The United States Securities and Exchange Commission
 - xii. Certain Landlords Represented by Barclay Damon LLP
 - xiii. Certain Landlords Represented by Allen Matkins Leck Gamble Mallory & Natsis LLP and Ballard Spahr LLP
 - xiv. Certain Landlords Represented by Esbrook P.C.
- Y. Combined Limited Objection of Beral, LLLP and Laurel Lakes, LLC to (A) the Debtors' Proposed Plan [D.I. 1312]; and (B) the Debtors' Motion for Entry of an Order, *Inter Alia*, Authorizing Franchise Group Intermediate V, LLC to Enter into and Perform Its Obligations Under the Asset Purchase Agreement [D.I. 1283] [[D.I. 1326](#), 4/28/25]
- Z. Limited Objection of Phillips Edison Landlords to Eighth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1414](#), 5/6/25]
- AA. Objection and Reservation of Rights of Pentex Franchisees to Eighth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1419](#), 5/6/25]
- BB. Limited Objection of A-Team Leasing, LLC to Eighth Amended Joint Chapter 11 Plan of Franchise Group and Its Debtor Affiliates [[D.I. 1424](#), 5/7/25]
- CC. Reservation of Rights of JPMorgan Chase Bank, N.A., as Prepetition ABL Agent, with Respect to the Debtors' Eighth Amended Plan [[D.I. 1428](#), 5/7/25]
- DD. Objection and Reservation of Rights of Brian Kahn and Lauren Kahn JT TEN to Confirmation of Eighth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1430](#), 5/7/25]
- EE. Objection of Buddy Mac Holdings, LLC and Affiliates to (I) Confirmation of Chapter 11 Plan, (II) Adequate Assurance of Further Performance, and (III) Proposed Rejection of Contracts and Leases, and (IV) Reservation of Rights [[D.I. 1435](#), 5/7/25]

- FF. Limited Objection and Reservation of Rights of STORE Master Funding IV, LLC to Eighth Amended Joint Chapter 11 Plan of Franchise, Group, Inc. and Its Debtor Affiliates [[D.I. 1436](#), 5/7/25]
- GG. Limited Response of Garden City Leasehold Properties LLC to Assumed Contracts/Lease List Filed in Connection with the Amended Plan Supplement for the Eighth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1440](#), 5/9/25]
- HH. Limited Objection of Certain Landlords to Confirmation of Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtors Affiliates [[D.I. 1443](#), 5/10/25]
- II. Objection and Reservation of Rights of bb BHF Stores LLC Franchisee to Eighth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1449](#), 5/13/25]
- JJ. Limited Objection and Reservation of Rights of Certain Landlords to Debtors' Proposed Cure Amounts [[D.I. 1456](#), 5/14/25]
- KK. (I) Reservation of Rights to Debtors Proposed Eighth Amended Plan and (II) Objection to Amended Plan Supplement by IREIT Pittsburgh Settlers Ridge, L.L.C., CRI New Albany Square LLC, Grove City Plaza L.P., and Northridge Crossing L.P. [[D.I. 1461](#), 5/14/25]
- LL. Oracle America, Inc.'s Assumption and Cure Objection [[D.I. 1463](#), 5/14/25]
- MM. Limited Objection and Reservation of Rights of Dell Financial Services, L.L.C. to Assumed Contracts List at Exhibit K on Amended Plan Supplement [[D.I. 1469](#), 5/14/25]
- NN. Objection and Reservation of Rights of KAWIPS Delaware Cuyahoga Falls, LLC to Eighth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1476](#), 5/14/25]
- OO. Limited Objection of BC Exchange Salt Pond and BCDPF Radar Distribution Center LLC to Amended Plan Supplement for the Eighth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1477](#), 5/14/25]
- PP. Limited Objection of the Chubb Companies to Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates [[D.I. 1492](#), 5/16/2025]

Status: This matter is going forward with respect to Item DD. With respect to Item PP, the parties are continuing to negotiate a consensual resolution. Currently, Item PP is going forward. All other items have either been consensually resolved or relate to cure and assumption issues that will be addressed, if necessary, at a subsequent hearing.

13. Debtors Motion for Entry of an Order Authorizing the Debtors to Exceed the Page Limitation Requirements for the Debtors' Memorandum of Law in Support of an Order Confirming the Confirmation of the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates and Omnibus Reply to Objections Thereto [[D.I. 1459](#), 5/14/25]

Objection Deadline: May 20, 2025 at 10:00 a.m. (ET)

Related Documents:

- A. Debtors' Memorandum of Law (I) in Support of an Order (A) Confirming the Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates and (B) Approving the Global Settlement and Release of Claims and Causes of Action by and Among the Global Settlement Parties, and (II) Omnibus Reply to Objections Thereto [[D.I. 1457](#), 5/14/25]

Responses Received: None to date.

Status: This matter is going forward.

FIRST INTERIM FEE APPLICATIONS

14. First Interim Fee Applications of Professionals for the First Interim Period from November 3, 2024, Through and Including January 31, 2025 [See **Exhibit A**, attached hereto]

Objection Deadline: See **Exhibit A**

Related Documents:

- A. Certification of Counsel Regarding Revised Order Granting First Interim Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Counsel for the Official Committee of Unsecured Creditors for the Period from November 21, 2024 Through January 31, 2025 [[D.I. 1262](#), 4/8/25]
- i. Notice of Withdrawal of Docket No. 1262 [[D.I. 1265](#), 4/8/25]

- B. Certification of Counsel Regarding Order Granting First Interim Application for Compensation and Reimbursement of Expenses of Province, LLC, as Financial Advisor to the Official Committee of Unsecured Creditors for the Period from November 21, 2024 Through January 31, 2024 [[D.I. 1263](#), 4/8/25]
- C. Certification of Counsel Regarding Order Granting First Interim Fee Application of Perella Weinberg Partners LP for Allowance of Compensation and Reimbursement of Expenses for the Period from November 26, 2024 Through January 31, 2025 [[D.I. 1264](#), 4/8/25]
- D. Certification of Counsel Regarding Omnibus Order Approving First Interim Fee Applications of Certain of the Debtors' Professionals [[D.I. 1275](#), 4/14/25]
- E. Amended Certification of Counsel Regarding Revised Order Granting First Interim Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Counsel for the Official Committee of Unsecured Creditors for the Period from November 21, 2024 Through January 31, 2025 [[D.I. 1288](#), 4/16/25]

Responses Received

- F. Reservation of Rights of the Ad Hoc Group of Freedom Lenders to the First Interim Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Counsel for the Official Committee of Unsecured Creditors for the Period from November 21, 2024 Through January 31, 2025 [[D.I. 1270](#), 4/9/25]

Status: Proposed orders have been filed under certifications of counsel. A hearing is not required unless the Court has questions or concerns.

[Signature Page Follows]

Dated: May 16, 2025
Wilmington, Delaware

/s/ Allison S. Mielke

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

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